

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

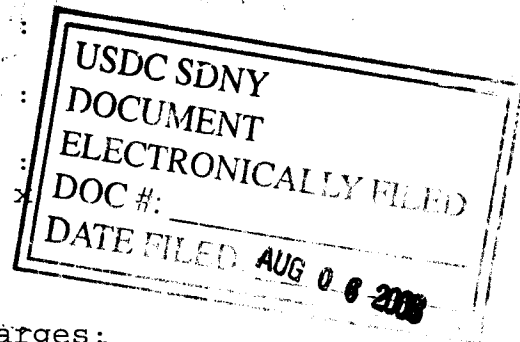
: INFORMATION

-v.-

: S1 08 Cr. 364 (RJS)

ERIBERTO TRINIDAD,
a/k/a "Hector Vega,"

Defendant.



COUNT ONE

The United States Attorney charges: .

1. From in or about 2002 up to and including in or about January 2008, in the Southern District of New York and elsewhere, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did combine, conspire, confederate, and agree together and with each other to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, TRINIDAD, and others known and unknown, agreed to commit armed robberies of narcotics traffickers in Manhattan and the Bronx, New York, and of commercial establishments and businesses engaged in interstate commerce in the Manhattan and the Bronx, New York.

(Title 18, United States Code, Section 1951.)

~~COUNTS TWO THROUGH NINE~~ ^{TEN} (10)

The United States Attorney further charges:

2. On or about the dates set forth below, in the Southern District of New York and elsewhere, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, and others known and unknown, unlawfully, willfully, and knowingly did commit and attempt to commit robbery, as that term is defined in Title 18, United States Code, Section 1951(b)(1), and would and did thereby obstruct, delay, and affect commerce and the movement of articles and commodities in commerce, as that term is defined in Title 18, United States Code, Section 1951(b)(3), to wit, TRINIDAD, and others known and unknown, committed the following robberies and attempted robberies of persons engaged in narcotics trafficking and/or commercial activities that affected interstate commerce:

<u>COUNT</u>	<u>ROBBERY/ ATTEMPT</u>	<u>APPROXIMATE DATE</u>	<u>GENERAL LOCATION</u>	<u>ITEM(S) SOUGHT</u>
TWO	Robbery	2002	197 th Street & Webster, Bronx, New York	Crack, cocaine, and U.S. currency
THREE	Robbery	2003	171 st Street & Saint Nicolas, Manhattan, NY	Cocaine and U.S. currency
FOUR	Robbery	2006	Bailey Avenue & 230 th Street, Bronx, NY	Cocaine
FIVE	Robbery	2006	181 st Street, Manhattan, NY	U.S. currency
SIX	Robbery	2007	Bedford Park, Bronx, NY	U.S. currency

<u>COUNT</u>	<u>ROBBERY/ ATTEMPT</u>	<u>APPROXIMATE DATE</u>	<u>GENERAL LOCATION</u>	<u>ITEM(S) SOUGHT</u>
SEVEN	Robbery	2007	Bronx, NY (near entrance to FDR)	Cocaine and U.S. currency
EIGHT	Robbery	2007	Bronx, New York (near a highway overpass)	Cocaine
NINE	Robbery	2007	Tremont Avenue & Sullivan Place, Bronx, NY	Furniture
TEN	Attempt	January 2008	Bronx, NY (near Lebanon Hospital)	Cocaine

(Title 18, United States Code, Sections 1951 and 2.)

COUNT ELEVEN

The United States Attorney further charges:

3. From in or about 2002 up to and including in or about January 2008, in the Southern District of New York and elsewhere, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, unlawfully, willfully, and knowingly, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely, the conspiracy to commit robbery charged in Count One of this Superseding Information, did use, carry and brandish firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, brandishment and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.)

COUNT TWELVE

The United States Attorney further charges:

4. From in or about 2007 up to and including in or about 2008, in the Southern District of New York and elsewhere, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, and others known and unknown, unlawfully, intentionally, and knowingly combined, conspired, confederated, and agreed together and with each other to violate the narcotics laws of the United States.

5. It was a part and an object of this conspiracy that ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, and others known and unknown, would and did distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), 841(b)(1)(A).

(Title 21, United States Code, Section 846.)

COUNT THIRTEEN

The United States Attorney further charges:

6. From in or about 2007 up to and including in or about January 2008, in the Southern District of New York and elsewhere, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, unlawfully, willfully, and knowingly, during and in relation to a drug trafficking crime for which he may be prosecuted in a court

of the United States, namely, the narcotics conspiracy charged in Count Twelve of this Superseding Information, did use and carry firearms, and, in furtherance of such crime, did possess firearms, and did aid and abet the use, carrying, and possession of firearms.

(Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.)

FORFEITURE ALLEGATIONS

(As to Counts One Through Ten)

7. As a result of committing the Hobbs Act robbery offenses in violation of 18 U.S.C. § 1951, alleged in Counts One through Ten of this Superseding Information, ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461, all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offenses.

Substitute Assets Provision

8. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with, a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or
(5) has been commingled with other property which
cannot be subdivided without difficulty;
it is the intent of the United States, pursuant to 21 U.S.C.
§ 853(p), to seek forfeiture of any other property of said
defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981 and
Title 28, United States Code, Section 2461.)

FORFEITURE ALLEGATION

(As to Count Twelve)

9. As a result of committing the controlled substance
offense alleged Count Twelve of this Superseding Information,
ERIBERTO TRINIDAD, a/k/a "Hector Vega," the defendant, shall
forfeit to the United States pursuant to 21 U.S.C. § 853, any and
all property constituting or derived from any proceeds he
obtained directly or indirectly as a result of the said violation
and any and all property used or intended to be used in any
manner or part to commit and to facilitate the commission of the
violation alleged in Count Twelve of this Information.

Substitute Assets Provision

10. If any of the above-described forfeitable
property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due
diligence;

(2) has been transferred or sold to, or deposited with,

a third person;

(3) has been placed beyond the jurisdiction of the Court;

(4) has been substantially diminished in value; or

(5) has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 21 U.S.C. § 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1) and 853.)

A handwritten signature in cursive script, reading "Michael J. Garcia", is positioned above a horizontal line.

MICHAEL J. GARCIA
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v -

ERIBERTO TRINIDAD,
a/k/a "Hector Vega,"

SUPERSEDING INFORMATION

S1 08 Cr. 364 (RJS)

(Title 21, United States Code, Section 846; Title 18, United States Code, Sections 924(c), 1951, and 2.)

MICHAEL J. GARCIA
United States Attorney.